Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006 OF CENTENNIAL COMMUNICATIONS CORP.

EB-06-TC-060 / WC DOCKET NO. 06-36

Pursuant to the recent Public Notice¹ issued by the Enforcement Bureau asking all telecommunications carriers to file with the Commission by February 6, 2006 the customer proprietary network information ("CPNI") compliance certificates required under section 64.2009(e) of the Commission's rules, Centennial Communications Corp. d/b/a/ Centennial Wireless and its subsidiaries providing telecommunications services² ("Centennial") hereby submit the following certificate and statement.

I, Phillip H. Mayberry, President US Wireless Operations, Centennial Communications Corp., hereby certify that I have personal knowledge that Centennial

¹ Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications, Public Notice, DA 06-223 (EB rel. Jan. 30, 2006); *see also* Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications (EB Docket No. 06-36), Public Notice, DA 06-258 (EB rel. Feb. 2, 2006).

The subsidiaries joining in this filing are: Bauce Communications of Beaumont, Inc., Bauce Communications, Inc., Centennial Beauregard Cellular LLC, Centennial Beauregard Holding Corp., Centennial Benton Harbor Cellular Corp., Centennial Benton Harbor Holding Corp., Centennial Caldwell Cellular Corp., Centennial Cellular Operating Company LLC, Centennial Cellular Telephone Company of San Francisco, Centennial Cellular Tri-State Operating Partnership, Centennial Claiborne Cellular Corp., Centennial Clinton Cellular Corp., Centennial Hammond Cellular LLC, Centennial Iberia Holding Corp., Centennial Jackson Cellular Corp., Centennial Lafayette Cellular Corp., Centennial Lafayette Communications LLC, Centennial Louisiana Holding Corp., Centennial Mega Comm Holding Corp., Centennial Michiana License Co. LLC, Centennial Michigan RSA 6 Cellular Corp., Centennial Michigan RSA 7 Cellular Corp., Centennial Morehouse Cellular LLC, Centennial Randolph Cellular LLC, Centennial Randolph Holding Corp., Centennial Southeast License Company LLC, Century Beaumont Cellular Corp., Century Cellular Realty Corp., Century Elkhart Cellular Corp., Century Indiana Cellular Corp., Century Michiana Cellular Corp., Century Michigan Cellular Corp., Century Southbend Cellular Corp., Elkhart Cellular Telephone Company, Elkhart Metronet Inc., Lafayette Cellular Telephone Company, Mega Comm LLC, Michiana Metronet Inc., Southbend Metronet Inc., Two additional subsidiaries providing services in Puerto Rico and the U.S. Virgin Islands are filing separate certifications concurrently with this certification.

has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, found at 47 C.F.R. Pt. 64, Subpt. U. Attached to this certificate is a statement explaining how the operating procedures of Centennial ensure that it is in compliance with the Commission's CPNI rules.

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Phillip H. Mayberry
President US Wireless Operations
Centennial Communications Corp.

STATEMENT CONCERNING PROCEDURES ENSURING COMPLIANCE WITH CPNI REGULATIONS

The operating procedures and practices of Centennial Communications Corp. d/b/a/ Centennial Wireless and its operating subsidiaries,³ ("Centennial") ensure that Centennial complies with the Commission's rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use of customer proprietary network information ("CPNI"). Compliance with such rules is demonstrated by the policies and practices employed by Centennial, a brief explanation of which is provided below.

First, Centennial only provides one category of services to its customers—commercial mobile radio service or "CMRS." Therefore, Centennial only uses CPNI to market various CMRS calling plans or CMRS features to customers who already purchase CMRS services from Centennial, which does not require customer approval under the Commission's rules. (Should Centennial expand its business to include other categories of service, it will implement a system to clearly establish the status of a customer's CPNI approval prior to any use of, disclosure of or permitting access to its customers' CPNI.)

Second, Centennial does not disclose CPNI to, or permit access to CPNI by, third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter), as is necessary for the provision of the CMRS service itself, or in connection with the use of contract workers. In any case, any third parties to which CPNI is disclosed or who are given access to CPNI are only given access to appropriate CPNI for the third party's purpose, and only after executing a confidentiality agreement or pursuant to the terms of a valid

³ See footnote 2 in attached certificate for list of Centennial subsidiaries joining in this filing.

subpoena, court order, etc.

Third, Centennial employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

- 1. Centennial provides all employees with a copy of its corporate privacy policy, which is contained in a document entitled "Code of Conduct." The Code of Conduct instructs employees to not disclose any customer account information to anyone, except as authorized by law and to seek advice from the legal department if the employee has a question regarding the validity of a subpoena, court order, etc. to disclose customer information. Moreover, sales and customer service employees receive additional instruction on the proper handling of confidential customer information. Centennial takes its responsibility to properly handle customer information very seriously and very recently took steps to ensure that its customers' information is safeguarded from "data brokers" seeking to obtain this information. Specifically, Centennial's President, Phillip H. Mayberry, sent a memorandum to all Centennial employees on January 18, 2006 warning them about the illicit techniques of data brokers in accessing CMRS customers' confidential information, reminding them of Centennial's Code of Conduct privacy policies and reminding them that supervisors are available to clarify any employee questions or concerns. See attached letter.⁴
- 2. Centennial has a disciplinary program to ensure compliance with its operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.

⁴ The letter was inadvertently dated 200<u>5</u>, rather than 200<u>6</u>. The letter was sent to employees, however, on January 18, 2006.

3. Centennial maintains records of marketing campaigns that use Centennial customer CPNI, as well as those occasions where CPNI is released to third parties (such a release occurring pursuant to a valid subpoena). Marketing activities are supervised by the Vice President of Marketing and sales management personnel. Records of marketing campaigns and any CPNI releases to third parties are retained for at least one year.



Date:

January 18, 2005

To:

All Associates

From:

Phil Mayberry

Subject:

Managing Confidential Information

"USA TODAY" published an article yesterday informing the public of the fact there are operators such as Locatecell.com who are specializing in offering private cellphone records for a fee. According to the article these operators have employees who masquerade as cellphone customers or even cellphone company employees and wheedle confidential information out of customer care or store representatives. That information, ranging from private cellphone numbers to the actual call records of cell and traditional phones, is then sold.

I am asking all Associates who have contact with customers be especially cautious if someone requests confidential information. We take our responsibility seriously and have processes in place to verify account access.

I want to remind you of the Code of Conduct section covering confidential information. If you have a concern or a question, please ask your supervisor.